

1 KILPATRICK TOWNSEND & STOCKTON LLP  
STEVEN D. MOORE (Bar No. 290875)  
smoore@kilpatricktownsend.com  
2 MEHRNAZ BOROUMAND SMITH (Bar No. 197271)  
mboroumand@kilpatricktownsend.com  
3 DARIUS C. SAMEROTTE (Bar No. 296252)  
dsamerotte@kilpatricktownsend.com  
4 Two Embarcadero Center, Suite 1900  
San Francisco, CA 94111  
5 Telephone: 415 576 0200  
6 Facsimile: 415 576 0300

7 Attorneys for Plaintiff  
GOPRO, INC.

9 MORRISON & FOERSTER LLP  
MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
10 NATHAN B. SABRI (CA SBN 252216)  
NSabri@mofo.com  
11 ESTHER KIM CHANG (CA SBN 258024)  
EChang@mofo.com  
12 425 Market Street  
San Francisco, California 94105-2482  
13 Telephone: (415) 268-7000  
14 Facsimile: (415) 268-7522

15 Attorneys for Defendants  
C&A Marketing, Inc.; C&A Licensing, LLC;  
16 and PLR IP Holdings, LLC

17 **UNITED STATES DISTRICT COURT**

18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 **SAN FRANCISCO DIVISION**

20 GOPRO, INC.

21 Plaintiff,

22 v.

23 C&A MARKETING, INC., C&A  
LICENSING, LLC, AND PLR IP  
24 HOLDINGS, LLC,

25 Defendants.

26 AND RELATED COUNTERCLAIMS  
27

Case No. 3:16-cv-03590-JST

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING TIME FOR  
DEFENDANTS TO FILE OPPOSITION  
TO PLAINTIFF'S MOTION FOR LEAVE  
TO FILE AN AMENDED COMPLAINT  
(DKT. NO. 39)**

Complaint Filed: June 27, 2016

28 STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME  
Case No. 3:16-cv-03590-JST

1 Pursuant to Local Rule 6-1(b), Plaintiff GoPro, Inc. ("GoPro") and Defendants C&A  
2 Marketing, Inc.; C&A Licensing, LLC; and PLR IP Holdings, LLC ("Defendants") hereby  
3 stipulate as follows:

4 WHEREAS, on April 14, 2017, GoPro moved for leave to file an amended complaint  
5 (Dkt. No. 39);

6 WHEREAS, the parties are discussing a resolution that would avoid further motion  
7 practice related to Dkt. No. 39;

8 WHEREAS, the parties have not yet completed these discussions but nevertheless wish to  
9 avoid unnecessary briefing, if possible;

10 WHEREAS, Defendants' opposition is currently due on April 28, 2017, GoPro's reply is  
11 due May 5, 2017, and the hearing is not set until June 15, 2017, thus providing sufficient time to  
12 adjust the briefing schedule while maintaining at least fourteen days between GoPro's reply brief  
13 and the hearing;

14 IT IS HEREBY STIPULATED AND AGREED that the time by which Defendants may  
15 file an opposition to GoPro's Motion for Leave to File an Amended Complaint (Dkt. No. 39) is  
16 extended one week from April 28, 2017 to May 5, 2017;

17 IT IS FURTHER STIPULATED AND AGREED that the time by which GoPro shall  
18 reply to Defendants' responses to GoPro's Motion for Leave to File an Amended Complaint (Dkt.  
19 No. 39) is extended one week from May 5, 2017 to May 12, 2017.

20 The parties previously stipulated to extend time to respond to the Complaint, to continue  
21 the initial case management conference, to serve invalidity contentions and exchange preliminary  
22 claim constructions, and to serve damages contentions and responsive damages contentions. This  
23 extension will not otherwise affect the schedule for the case.

24 ///

25 ///

26 ///

27 ///

28 ///

1 Dated: April 28, 2017

Dated: April 28, 2017

2 KILPATRICK TOWNSEND & STOCKTON LLP

MORRISON & FOERSTER LLP

3 /s/ Mehrnaz Boroumand Smith

4 MEHRNAZ BOROUMAND

/s/ Nathan B. Sabri

NATHAN B. SABRI

5 Attorneys for Plaintiff GoPro, Inc.

6 Attorneys for Defendants C&A  
Marketing, Inc.; C&A Licensing, LLC;  
7 and PLR IP Holdings, LLC

8  
9 **ATTESTATION OF E-FILED SIGNATURE**

10 I, Mehrnaz Boroumand Smith, am the ECF User whose ID and password are being used to  
11 file this **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR**  
12 **DEFENDANTS TO FILE OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO**  
13 **FILE AN AMENDED COMPLAINT (DKT. NO. 39)**. In compliance with Local Rule 5-  
14 1(i)(3), I hereby attest that Nathan B. Sabri has concurred in this filing.

15  
16 Dated: April 28, 2017

/s/ Mehrnaz Boroumand Smith  
Mehrnaz Boroumand Smith

17  
18  
19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20  
21  
22 Dated: May 1, 2017

  
Honorable Jon S. Tigar  
United States District Judge